

Newport News Division

and having reason to know that such visual depiction would be transmitted using any means and facility of interstate and foreign commerce and was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2251(a)).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 9, 2021, in the Eastern District of Virginia and elsewhere, the defendant, ELLIOTT DALE VELEZ, a/k/a “Elliott Dale Landers”, did knowingly attempt to employ, use, persuade, induce, entice, and coerce a minor, Jane Doe 2, who had not attained the age of 18 years to engage in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), specifically, actual and simulated masturbation by a pre-pubescent female child, and lascivious exhibition of the anus, genitals or pubic area of a pre-pubescent female child, for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means and facility of interstate and foreign commerce and was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2251(a)).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 9, 2021, in the Eastern District of Virginia and elsewhere, the defendant, ELLIOTT DALE VELEZ, a/k/a “Elliott Dale Landers”, did knowingly attempt to employ, use, persuade, induce, entice, and coerce a minor, Jane Doe 3, who had not attained the age of 18 years to engage in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), specifically, actual and simulated lascivious exhibition of the anus, genitals or pubic area of a pre-pubescent female child, for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means and facility of interstate and foreign commerce and was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2251(a)).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 9, 2021, in the Eastern District of Virginia and elsewhere, the defendant, ELLIOTT DALE VELEZ, a/k/a “Elliott Dale Landers”, did knowingly attempt to employ, use, persuade, induce, entice, and coerce a minor, Jane Doe 4, who had not attained the age of 18 years to engage in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), specifically, actual and simulated lascivious exhibition of the anus, genitals or pubic area of a pre-pubescent female child, for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means and

facility of interstate and foreign commerce and was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2251(a)).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 15, 2021, in the Eastern District of Virginia and elsewhere, the defendant, ELLIOTT DALE VELEZ, a/k/a “Elliott Dale Landers”, did knowingly attempt to employ, use, persuade, induce, entice, and coerce a minor, Jane Doe 5, who had not attained the age of 18 years to engage in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), specifically, actual and simulated lascivious exhibition of the anus, genitals or pubic area of a pubescent female child, for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means and facility of interstate and foreign commerce and was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2251(a)).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 24, 2021, in the Eastern District of Virginia and elsewhere, the defendant, ELLIOTT DALE VELEZ, a/k/a “Elliott Dale Landers”, did knowingly attempt to employ, use, persuade, induce, entice, and coerce a minor, Jane Doe 6, who had not attained the

age of 18 years to engage in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), specifically, actual and simulated masturbation by a pubescent female child, and lascivious exhibition of the anus, genitals or pubic area of a pubescent female child, for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means and facility of interstate and foreign commerce and was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2251(a)).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 27, 2021, in the Eastern District of Virginia and elsewhere, the defendant, ELLIOTT DALE VELEZ, a/k/a “Elliott Dale Landers”, did knowingly attempt to employ, use, persuade, induce, entice, and coerce a minor, Jane Doe 7, who had not attained the age of 18 years to engage in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), specifically, actual and simulated lascivious exhibition of the anus, genitals or pubic area of a pre-pubescent female child, for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means and facility of interstate and foreign commerce and was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2251(a)).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 13, 2022, in the Eastern District of Virginia and elsewhere, the defendant, ELLIOTT DALE VELEZ, a/k/a “Elliott Dale Landers”, did knowingly attempt to employ, use, persuade, induce, entice, and coerce a minor, Jane Doe 8, who had not attained the age of 18 years to engage in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), specifically, actual and simulated lascivious exhibition of the anus, genitals or pubic area of a pre-pubescent female child, and bestiality, for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means and facility of interstate and foreign commerce and was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2251(a)).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 13, 2022, in the Eastern District of Virginia and elsewhere, the defendant, ELLIOTT DALE VELEZ, a/k/a “Elliott Dale Landers”, did knowingly attempt to employ, use, persuade, induce, entice, and coerce a minor, Jane Doe 9, who had not attained the age of 18 years to engage in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), specifically, lascivious exhibition of the anus, genitals or pubic area of a female toddler, for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means and facility of interstate and foreign

commerce and was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2251(a)).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 10, 2021, in the Eastern District of Virginia and elsewhere, the defendant, ELLIOTT DALE VELEZ, a/k/a “Elliott Dale Landers”, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: an image entitled “IMG_0187.JPG,” depicting a minor engaging in sexually explicit conduct, specifically, actual and simulated lascivious exhibition of the anus, genitals or pubic area of an early pubescent female, that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1)).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 16, 2021, in the Eastern District of Virginia and elsewhere, the defendant, ELLIOTT DALE VELEZ, a/k/a “Elliott Dale Landers”, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: a video entitled “IMG_0233.MOV,” depicting a minor engaging in sexually explicit conduct, specifically, actual and simulated lascivious exhibition of the anus, genitals or pubic area of a prepubescent female, and bestiality, that had been mailed and using any means and facility of interstate and foreign

commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1)).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 22, 2021, in the Eastern District of Virginia and elsewhere, the defendant, ELLIOTT DALE VELEZ, a/k/a “Elliott Dale Landers”, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: a video entitled “IMG_0278.MOV,” depicting a minor engaging in sexually explicit conduct, specifically, actual and simulated masturbation of prepubescent female, lascivious exhibition of the anus, genitals or pubic area of a prepubescent female, and bestiality, that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1)).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 10, 2022, in the Eastern District of Virginia and elsewhere, the defendant, ELLIOTT DALE VELEZ, a/k/a “Elliott Dale Landers”, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: a video entitled “IMG_0472.MP4,” depicting two minors engaging in sexually explicit conduct, specifically, actual and simulated genital-genital sexual intercourse by an early pubescent female child with an early pubescent female child, lascivious exhibition of the anus, genitals or pubic area of an early

pubescent female, and bestiality, that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1)).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 8, 2022, in the Eastern District of Virginia and elsewhere, the defendant, ELLIOTT DALE VELEZ, a/k/a “Elliott Dale Landers”, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: a video entitled “IMG_0639.MOV,” depicting a minor engaging in sexually explicit conduct, specifically, actual and simulated lascivious exhibition of the anus, genitals or pubic area of a prepubescent female, and bestiality, that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1)).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 17, 2021, in the Eastern District of Virginia and elsewhere, the defendant, ELLIOTT DALE VELEZ, a/k/a “Elliott Dale Landers”, using a facility and means of interstate and foreign commerce, did knowingly and attempted to persuade, induce, entice, and coerce Jane Doe 5, an individual who has not attained the age of 18 years to engage in sexual activity for which any person can be charged with a criminal offense, to wit, Indecent Liberties by

Children, in violation of Virginia Code Section 18.2-370.01.

(In violation of Title 18, United States Code, Section 2422(b)).

FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

1. Pursuant to Rule 32.2 FED. R. CRIM. P., if convicted of any count in the Indictment, the defendant shall forfeit the following property to the United States:

a. any and all matter which contains child pornography or any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2251 *et seq.*;

b. any and all property, real and personal, used or intended to be used in any manner or part to commit or to promote the commission of violations of Title 18, United States Code, Section 2251 *et seq.*, and any property traceable to such property; and

c. any and all property, real and personal, constituting, derived from, or traceable to gross profits or other proceeds obtained from the violations of Title 18, United States Code, Section 2251 *et seq.*

2. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

3. The property subject to forfeiture includes, but is not limited to, the following:

- Apple iPhone, Model: A1533, IMEI: 352007063455447
- Samsung Cellular Telephone, Model: SM-S124DL(GP), Serial number: R9HT10900DK
- Motorola Cellular Telephone, Model: One, Serial number: ZY22DR5682

- Apple Computer, Model: A1418, Serial number: C02FC13S07DW

(In accordance with Title 18, United States Code, Sections 2253).

United States v. Elliott Velez
Criminal No. : 4:22cr28

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

A TRUE BILL:

REDACTED COPY

FOREPERSON

JESSICA D. ABER
UNITED STATES ATTORNEY

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